

HRL EXHIBIT 11



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November 23, 2020

VIA E-MAIL

Michelle J. Looby
Gustafson Gluek PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402

**Re: *In re Pork Antitrust Litigation*, Case No. 18-cv-01776-JRT-HB (D. Minn.)
Meet and Confer Regarding Hormel Foods' Document Custodians**

Dear Michelle:

Following on our call this afternoon, this letter confirms Hormel Foods' current position regarding Document Custodians.

In response to Plaintiffs' requests for Document Custodians who manage the pricing of "Pork" products, Hormel Foods has continued its investigation to ascertain appropriate individuals. As we have discussed during our several meet-and-confer conversations, Plaintiffs' request is challenging for Hormel Foods because its responsibility for pricing is decentralized. Hormel Foods has nonetheless undertaken a good-faith effort to identify those individuals principally responsible for managing the pricing of "Pork" products.

As we discussed this afternoon, Hormel Foods conditionally agrees to add the following persons to its list of Document Custodians:

Name	Title	Date Range
Michael Gyarmarty	Marketing Director, Deli	2009-2013
Neal Hull	Marketing Director, Foodservice	Relevant Time Period
Jennifer Johnson	Marketing Director, Meat Products	2013-2016
Holly LaVallie	Marketing Director, Deli	2013-2018
Eric Steinbach	Marketing Director, Meat Products	2009-2012, 2014-2018
Steven Venenga	Marketing Director of Meat Products	2008-2011

We again confirm that this group of custodians should replace Craig Drefcinski, Mark Ourada, and David Weber. We have also confirmed, in response to your November 20 letter, that

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Hormel Foods does not believe that Jeffrey Baker, Deanna Brady, Mark Morey, or Kurt Mueller are appropriate custodians based on Plaintiffs' stated desire to have custodians responsible for managing pricing during the Relevant Time Period.

To be clear, as we discussed, Hormel Foods cannot represent that only proffered custodians might have responsive documents. But that would be an impossible standard. Taking into account the additions and subtractions set forth in this letter, Hormel Foods is willing to agree to **30 Document Custodians**. We are convinced that this is more than reasonable as a compromise while giving Plaintiffs full visibility to how Hormel Foods prices "Pork" products. Identifying additional custodians—in particular, the notion of adding layers of the organizational chart without good reason at this stage—would add significant burden and duplication with no clear benefit.

I am also confirming that Hormel Foods will collect James Snee's documents beginning in October 2015 when he joined the Board of Directors prior to assuming CEO responsibilities the following year.

Please confirm that we are in agreement on the above, and that there are no "deferred disputes" for purposes of complying with the November 23 deadlines set forth in the Order on Stipulation Regarding Pretrial Scheduling Order (Dkt. No. 532).

Very truly yours,



Craig S. Coleman

cc: Plaintiffs' counsel of record (*via e-mail*)
Richard A. Duncan (*via e-mail*)
Emily E. Chow (*via e-mail*)